

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 16-00144-01/02-CR-W-DGK
	)	
JAMERL M. WORTHAM, and	)	
ANTHONY B. WILLIAMS,	)	
	)	
Defendants.	)	

**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

**PENDING CHARGE:** On December 13, 2016, the Grand Jury returned a seventeen-count Superseding Indictment. Count One charges Defendants Jamerl M. Wortham and Anthony B. Williams with conspiracy to commit kidnapping in violation of 18 U.S.C. §§1201(a)(1) and (c). Counts Two, Four and Six charge Defendants with kidnapping in violation of 18 U.S.C. §§ 1201(a)(1) and 2. Counts Three, Five, Seven, Nine, Twelve, and Fourteen charge Defendants with possession of a short-barreled shotgun in furtherance of a crime of violence or drug trafficking crime in violation of 18 U.S.C. §§ 924(c)(1)(A), (B)(i), and 2. Count Eight charges Defendants with carjacking in violation of 18 U.S.C. § 2119 and 2. Count Ten charges Defendants with conspiracy to commit Hobbs Act Robbery in violation of 18 U.S.C. § 1951(a). Count Eleven charges Defendants with Attempted Hobbs Act Robbery in violation of 18 U.S.C. §§ 1951(a) and 2. Count Thirteen charges Defendants with distribution of phencyclidine in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2. Count Fifteen charges Defendants with being a felon in possession of a firearm in violation of 18 U.S.C. §§922(g)(1), 924(a)(2), and 2. Count Sixteen charges Defendants with possession of an unregistered firearm in violation of 26 U.S.C. §§ 5841, 5861(d), 5871, and 18 U.S.C. § 2. Count Seventeen charges Defendants with possession of a firearm with obliterated serial number in violation of 26 U.S.C. §§ 5842, 5861(h), 5871, and 18 U.S.C. § 2.

The following matters were discussed and action taken during the pretrial conference:

**TRIAL COUNSEL:**

Government: Jeffrey Quinn McCarther and Alison Dawn Dunning  
Case Agent: Jason Ramsey FBI Special Agent and Detective John Keil, Kansas City  
Police Department  
Defense: Todd M. Schultz (for Defendant Jamerl M. Wortham); Paralegal: Sandy Schnak  
David Harold Johnson (for Defendant Anthony B. Williams)

**OUTSTANDING MOTIONS:**

01/22/2019	<a href="#">view86</a>	MOTION in limine <i>Regarding Defendants' Self-Serving Statements</i> by USA as to Jamerl M. Wortham, Anthony B Williams. Suggestions in opposition/response due by 2/5/2019 unless otherwise directed by the court. (McCarther, Jeffrey) (Entered: 01/22/2019)
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**TRIAL WITNESSES:**

Government: 11-13 with stipulations; 14-16 without stipulations

Defendant Wortham: uncertain number of witness

Defendant Williams: 20 witnesses

**TRIAL EXHIBITS**

Government: approximately 37-52 exhibits

Defendant Wortham: uncertain as to the number of exhibits

Defendant Williams: no more than 20 exhibits

**DEFENSES:** General denial as to both Defendants.

**POSSIBLE DISPOSITION:**

( ) Definitely for trial; (X) Possibly for trial; ( ) Likely a plea will be worked out

**TRIAL TIME: 5-6 days total**

Government's case including jury selection: 4-5 day(s)

Defendant Wortham's case: uncertain number of day(s)

Defendant Williams' case: 1 day

**STIPULATIONS:** Possible stipulations but no agreement on stipulations at this point.

**UNUSUAL QUESTIONS OF LAW:** none

**FILING DEADLINES:****Witness and Exhibit List**

Government: **Updated list due on or before January 29, 2019.**

Proposed Witness List filed on January 22, 2019.

Proposed Exhibit List filed on January 22, 2019.

Defense: (none filed) **Due on or before January 29, 2019.**

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions: Due by noon, Wednesday, February 6, 2019.**

**Please Note:** Jury instructions must comply with Local Rule 51.1

**Motion in Limine:** One or both parties is/are considering a motion in limine regarding co-defendant and prior convictions. **Motions in Limine due on or before February 6, 2019.**

**TRIAL SETTING:** Criminal jury trial docket set for February 11, 2019.

**Please note:** The Government prefers the first week. Scheduling the witnesses have all conformed to the first week of the docket. The second week will be a hardship for purposes of scheduling the witnesses. Furthermore, this is a 5-6 day trial. Defense is available both weeks.

**IT IS SO ORDERED.**

/s/ Lajuana M. Counts

Lajuana M. Counts

United States Magistrate Judge